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Monsanto

LAW DEPARTMENT

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August 23, 1989

William C. Child, Manager
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: L1630200005 -- St. Clair County
Sauget Sites -- Area I and Area II

Dear Mr. Child:

This will acknowledge receipt of your two letters dated August 7, 1989 pertaining to the Sauget site Areas I and II.

Please be advised that Monsanto has, and continues to, advocate a sound environmental approach to investigation of alleged environmental damage and appropriate action to remediate environmental damage. Monsanto's actions include the managing of several multiparty major Superfund cleanups in several regions, and also the first Superfund cleanup approved for "mixed funding." In this matter we are willing to engage in good faith negotiations with IEPA and the Illinois Attorney General's office relative to these Sauget site Areas I and II.

We are constrained to note, however, that the potentially responsible party (PRP) list which formed attachment 2 to each of your letters is certainly not exhaustive. For example, your PRP list for Area I designates only three potentially responsible parties. Given the number of additional companies in the Sauget area which generated and disposed of wastes in the vicinity during the relevant period, we fully expect that your PRP list will be revised to include many additional PRPs. The same may also be said for the truncated list attached to the Area II letter. In this regard, we encourage you to examine closely any existing generation/disposal documents as well as those added documents forthcoming from the Section 104(e) information requests, with a view to preparing a more accurate PRP list.

In addition, we must note that your Section 104(e) information requests were sent to only a limited group of possible generators, transporters, and/or disposers in the immediate areas surrounding

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Monsanto's Sauget Area I 104(e) responses

Exhibit #	description	Teammember
3.1	index of submissions 1/6/95	
3.2	histories of Queeny, Kummrich, & Chemical Warfare plants, including discussion of chemicals Produced	Leah.
3.3	agreements, interoffice memos regarding haulers, etc	Leslie/Tom
3.4	historical information regarding wastewater and sewer system; information on Sauget's late 80s Sewer improvement project	Leah/ Leslie/Tom
3.5	notification of haz. Waste site And notes from interviews w/ Various haulers...	Marsha/Frank
3.6	???	
3.7	wastewater discharge permit	?
3.8	field study for Area I, SOW, Analysis, etc.	Leah

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Area I, Site G

Have persons identified in Q#1 been deposed?

Exhibit 3.2 gives basic histories of plants but does not address specifically:

=>the recycling process for ea. group of chemicals

=>limited (no) information regarding prior use by Commercial Acid Works or

Indiahoma Oil Refinery

=>off-spec products treatment and disposal practices

=>sale of hazardous waste as by-product...to whom? (14)

=>sale of/disposal of obsolete process equipment

=>treatment/disposal of contaminated clothing, protective gear, and lab waste

Q 18 objected to b/c asked if any haz. Materials generated/used at facility were disposed of at facility=>restate question using site name (Area I, or site G//area II????)

→ Q 19-21 responses object that does not seek information, but admission

[104(e)2]

Q 22: follow up- Ks w/ Sauget provide access only to "permitted" agents ...who were these agents?

→ DC dredged

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